

UNITED STATES DISTRICT COURT
DISTRICT OF NEW HAMPSHIRE

_____)	
UNITED STATES OF AMERICA)	
)	
v.)	Cr. No. 18-CR-00127-1-LM
)	
AHMAD KHAWAJA)	
_____)	

**DEFENDANT’S SECOND SUPPLEMENTAL MEMORANDUM IN SUPPORT OF
MOTION TO REDUCE TERM OF IMPRISONMENT PURSUANT TO 18 U.S.C. §
3582(c)(1)(A)**

NOW COMES the Defendant, Ahmad Khawaja, by and through his counsel, Wilson, Bush & Keefe, P.C. (“the Defendant”), and hereby respectfully submits the within second supplemental memorandum in support of his request that this Honorable Court reduce his term of imprisonment and order him to be placed on probation or supervised release accompanied with home confinement due to the current COVID-19 crisis at FCI Danbury and the Defendant’s own personal circumstances. In support thereof, the Defendant submits the following:

Factual Background

1. The Defendant herein incorporates the factual background previously provided to the Court.
2. During the hearing on the Defendant’s motion, the Defendant testified that almost all inmates who display symptoms of COVID-19 do not report it to Bureau of Prisons medical personnel due to not wanting to be placed in the isolation unit. The Defendant also testified that a staff member told the Defendant that several newly arrived inmates had tested positive for COVID-19. Generally, the Defendant submitted to the Court that FCI Danbury

inaccurately represents the number of inmates and staff infected with COVID-19 at any given time.

3. On the day of the hearing, the BOP website indicated only one staff member was currently experiencing COVID-19. Today that website reports two staff members and one inmate.

4. The Defendant has also reported to counsel that his bunkmate has exhibited symptoms of COVID-19 and sought medical attention for this. The Defendant is now gravely concerned he will or has contracted COVID-19.

5. The Defendant herein incorporates all prior legal and factual arguments.

6. The Defendant reincorporates his prior prayers for relief.

Finally, the defense requests any such other relief as may be deemed just and equitable.

Respectfully submitted,

Ahmad Khawaja
By and through his counsel,

DATED: August 4, 2020

/s/Charles J. Keefe
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Certificate of Service

I, Charles J. Keefe, hereby certify that true copies of the above document were delivered to AUSA John Davis and the United States Probation Office.

/s/Charles J. Keefe
Charles J. Keefe